

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT
Alexandria Division**

UNITED STATES OF AMERICA,

v.

Criminal Case No. 1:18-cr-00457

BIJAN RAFIEKIAN, *et al.*,

Defendants.

**NON-PARTY MICHAEL T. FLYNN'S MOTION TO INTERVENE
AND FILE *EX PARTE* BRIEFING**

Non-Party Michael T. Flynn ("General Flynn"), respectfully moves to intervene in this matter for the limited purpose of filing *ex parte* briefing addressing the redactions in the twenty-seven (27) documents to be submitted to the Court for an *in camera* inspection, pursuant to the June 12, 2019 Order (Dkt No. 209) granting Defendant Bijan Rafiekian's Motion for *In Camera* Inspection of Attorney-Client Communications. Dkt No. 157. General Flynn requests that he be permitted to file an *ex parte* brief no later than June 24, 2019, or at such other time as the Court may direct. The grounds for this Motion are set forth in the accompanying memorandum. The government does not oppose this motion.

Dated: June 18, 2019

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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2019, I filed the foregoing in the office of the Clerk, which will provide notice to all counsel of record, using the CM/ECF system.

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